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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DAVID ELIAS, an individual, on behalf of
himself, the general public and those similarly situated

Plaintiff,

v.

HEWLETT-PACKARD COMPANY; AND DOES 1
THROUGH 50

Defendants

CASE NO. 5:12-cv-00421

**STIPULATION REGARDING
DISCOVERY DISPUTE JOINT
REPORT No. 2
AND ~~[PROPOSED]~~ ORDER**

WHEREAS, on May 7, 2014, Plaintiff and Defendant Hewlett Packard Company (“HP”) filed a Discovery Dispute Joint Report #2 (the “Joint Report”), concerning the scheduling of the parties’ respective depositions and the inspection of Plaintiff’s Pavilion s5305z desktop computer [Dkt. #59];

WHEREAS, following the filing of the Joint Report, the parties continued to meet and confer regarding the disputed matters set forth in the Joint Report;

WHEREAS, through these further meet-and-confer efforts, the parties have agreed to a schedule for the completion of the outstanding depositions and computer inspection;

WHEREAS, the parties desire to resolve the matters set forth in the Joint Report by setting forth a stipulated schedule to be approved by the Court;

NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties, through their respective counsel of record, that the outstanding depositions and computer inspection will proceed according to the following schedule, subject to the Court's approval, thereby fully resolving the issues set forth in the Joint Report:

<u>Event</u>	<u>Date</u>
Inspection of Plaintiff's s5305z Desktop Computer	May 28, 2014
Deposition of Girish Srinivasan, HP's Rule 30(b)(6) Designee on Topics Pertaining to Sales and Marketing	June 6, 2014
Depositions of Plaintiff David Elias, and Plaintiff's wife, Kenia Elias	June 12, 2014
Deposition of Karl Hassur, HP's Rule 30(b)(6) Designee on Topics Pertaining to Technology	June 13, 2014 ¹

Dated: May 15, 2014

/s/ Seth A. Safier

Seth A. Safier

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Attorneys for Plaintiff, David Elias

Dated: May 15, 2014

/s/ Timothy W. Loose

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Attorneys for Defendant, Hewlett-Packard Company

¹ Mr. Hassur currently is scheduled for jury duty from June 2–6. Should Mr. Hassur be selected to serve on a trial that is continuing at the time of his currently scheduled deposition, the parties agree to promptly find an alternative and mutually agreeable date for the deposition to occur.

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties, and **GOOD CAUSE APPEARING THEREFOR**, the issues set forth in Discovery Dispute Joint Report No. 2 are resolved and the outstanding discovery shall proceed according to the following schedule:

<u>Event</u>	<u>Date</u>
Inspection of Plaintiff's s5305z Desktop Computer	May 28, 2014
Deposition of Girish Srinivasan, HP's Rule 30(b)(6) Designee on Topics Pertaining to Sales and Marketing	June 6, 2014
Depositions of Plaintiff David Elias, and Plaintiff's wife, Kenia Elias	June 12, 2014
Deposition of Karl Hassur, HP's Rule 30(b)(6) Designee on Topics Pertaining to Technology	June 13, 2014 ²

IT IS SO ORDERED.

DATED: May 16, 2014


 THE HONORABLE HOWARD R. LLOYD
 UNITED STATES MAGISTRATE JUDGE

² Mr. Hassur currently is scheduled for jury duty from June 2–6. Should Mr. Hassur be selected to serve on a trial that is continuing at the time of his currently scheduled deposition, the parties agree to promptly find an alternative and mutually agreeable date for the deposition to occur.